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Attorneys for Individual Butte Fire, North Bay Fires,
And Camp Fire Victim Claimants

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

In re
PG&E CORPORATION and
PACIFIC GAS AND ELECTRIC
COMPANY,

Debtors.

☐ Affects PG&E Corporation
☐ Affects Pacific Gas and Electric Company
☒ Affects both Debtors

*All papers shall be filed in the Lead Case,
No. 19-30088 (DM)

) Case No. 19-30088 (DM)
) Chapter 11
) (Lead Case)
) (Jointly Administered)

) **DECLARATION OF DARIO DE**
) **GHETALDI, ESQ., IN SUPPORT OF**
) **JOINDER IN THE OBJECTION BY**
) **THE OFFICIAL COMMITTEE OF**
) **TORT CLAIMANTS TO DEBTORS' DIP**
) **FINANCING MOTION (ECF NO. 23)**

) Date: March 27, 2019
) Time: 9:30 a.m. (Pacific Daylight Time)
) Place: United States Bankruptcy Court
) Courtroom 17, 16th Floor
) San Francisco, CA 94102

1 I, Dario de Ghetaldi, hereby swear under penalty of perjury:

2 1. I am an attorney at law, licensed to practice in the Northern District of California, the
3 Ninth Circuit Court of Appeal, the United States Supreme Court, and all state courts in the State of
4 California.

5 2. I served as liaison counsel in cases arising out of the 2010 San Bruno gas pipeline
6 explosion and fire. I am currently on the Plaintiffs' Executive Committee in the 2015 Butte Fire Cases
7 and the 2017 North Bay Fire Cases.

8 3. Our office along with co-counsel currently represent 141 survivors of the 2015 Butte
9 Fire, 320 survivors of the 2017 North Bay Fires, and 1,330 victims of the 2018 Camp Fire, including
10 families of 17 persons who died in three of those fires. Our office separately represents one of the
11 victims of the August 2015 PG&E gas pipeline explosion and fire at the Fresno Sheriff's gun range.

12 4. In the Butte Fire Cases, I took or attended almost 100 depositions of PG&E employees,
13 management personnel, and experts, and personally reviewed over 100,000 pages of documents
14 produced by PG&E.

15 5. Among the documents I reviewed in the Butte Fire Cases were forty-two (42) liability
16 insurance policies and associated documents produced by PG&E as "Confidential" in response to
17 plaintiffs' document requests. Over half of those policies appear to provide excess coverage for
18 exemplary damages.

19 6. I have also reviewed the portions of PG&E's 2018 Form 10-K dated February 28, that
20 relate to PG&E's insurance coverage. See [https://last10k.com/sec-filings/1004980/0001004980-19-
21 000004.htm#fullReport?utm_source=last10k&utm_medium=PDF&utm_campaign=share&utm_ter
22 m=1004980](https://last10k.com/sec-filings/1004980/0001004980-19-000004.htm#fullReport?utm_source=last10k&utm_medium=PDF&utm_campaign=share&utm_term=1004980), at p. 157.

23 7. From this review, it appears that available insurance for the 2015 Butte Fire was
24 underreported by approximately \$10,000,000.00 in Debtors' 2018 Form 10-K.

25 8. I understand that unfunded prepetition settlement agreements between Debtors and
26 approximately 130 survivors of the 2015 Butte Fire have a total value of approximately
27 \$18,000,000.00.

28 / / /

1 I declare under penalty that I have read the foregoing Declaration and know its contents. The
2 same is true of my personal knowledge except for those matters stated on information and belief that
3 I believe to be true.

4 Executed on March 11, 2019, at Millbrae, California.

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